

December 2, 2016

Via Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

**Re: In the Matter of Lifeline and Link Up Reform and Modernization
Notice of Forbearance from Lifeline BIAS Requirements
WC Docket No. 11-42**

Pursuant to the Lifeline Modernization Order¹ and the BIAS Forbearance Public Notice,² as authorized representatives of DOCOMO Pacific, Inc. d/b/a Guam Cellular & Paging (“DPAC”) and Guam Telecom, LLC (“Guam Telecom”), we hereby notify the Commission that DPAC and Guam Telecom elect to accept the Commission’s forbearance from Lifeline broadband internet access service (“BIAS”) requirements throughout their ETC service areas.

DPAC is a competitive ETC with service areas in Guam. Guam Telecom is a competitive ETC with its service area in Saipan, Commonwealth of the Northern Mariana Islands. As recipients of frozen high cost support (“FHCS”), neither DPAC nor Guam Telecom are required to provide Lifeline-supported BIAS in their ETC service areas.³ DPAC and Guam Telecom hereby provide notice that they are availing themselves of the FCC’s forbearance from the Lifeline BIAS requirement throughout their ETC service areas for the study areas listed in Attachment A.

Pursuant to advice from Wireline Competition Bureau staff, DPAC and Guam Telecom will supplement this filing with census block information at a future date.

¹ *Lifeline and Link Up Reform and Modernization et al.*, Third Report and Order, Further Report and Order,, and Order on Reconsideration, 31 FCC Rcd 3962 (2016)(“*Lifeline Modernization Order*”).

² *Wireline Competition Bureau Provides Guidance Regarding Filing Procedures for Eligible Telecommunications Carriers Seeking to Invoke Forbearance Granted by Lifeline Modernization Order*, Public Notice, WC Docket No. 11-42, DA 16-1316 (WCB. rel. November 22, 2016) (“*BIAS Forbearance Public Notice*”).

³ Unlike recipients of other types of high-cost support, who were granted forbearance based on census block, FHCS recipients “are not required to offer Lifeline-supported broadband services in their designated service areas.” See *Lifeline Modernization Order*, 31 FCC Rcd at 4074 (Para. 311).

Notwithstanding this forbearance filing and in accordance with the *Lifeline Modernization Order*, DPAC and Guam Telecom reserve the right to offer and receive reimbursement for providing Lifeline-supported BIAS to eligible subscribers.⁴

Please contact the undersigned if you have questions.

Sincerely,



David A. LaFuria
Steven M. Chernoff
Robert S. Koppel
Lukas, Nace, Gutierrez & Sachs, LLP
8300 Greensboro Drive
Suite 1200
McLean, VA 22102
703-584-8670 (Direct)
703-584-8696 (Fax)
703-389-1752 (Mobile)

cc: TelcoLifeline@usac.org

⁴ See *id.* See also, *BIAS Forbearance Public Notice*, *supra*, at p. 2

Attachment A
Information Regarding ETC Designations

ETC Name	SAC	State	Designating Authority	Date(s) of Designation
DOCOMO Pacific, Inc. d/b/a Guam Cellular & Paging	669001	GU	FCC	1/25/2002
Guam Telecom, LLC	669005	GU	Guam Public Utilities Commission	11/29/2010
DOCOMO Pacific, Inc. d/b/a Guam Cellular & Paging	659001	MP	FCC	7/23/2004